

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

**IN RE: NATIONAL PRESCRIPTION
OPIATE LITIGATION**

This document relates to:

*The County of Summit, Ohio, et al. v. Purdue
Pharma L.P., et al.*
Case No. 18-op-45090

and

*The County of Cuyahoga v. Purdue Pharma
L.P., et al.*
Case No. 1:18-op-45004

**MDL No. 2804
Case No. 17-md-2804
Hon. Judge Dan A. Polster**

AFFIRMATIVE DEPOSITION DESIGNATIONS FOR DEBORAH BISH

Pursuant to the Civil Jury Trial Order, ECF No. 1598, entered in In re National Prescription Opiate Litigation (MDL 2804) on May 1, 2019 (as amended in Judge Polster's July 29, 2019 order), Defendant Walgreen Co. ("Walgreens") hereby submits its affirmative deposition testimony designations for Deborah Bish together with Walgreens' objections to Plaintiffs' counters and Walgreens' responses to Plaintiffs' objections (*see* Exhibit A).

Walgreens reserves all rights, including all rights to revise or withdraw its affirmative deposition testimony designations for Deborah Bish, its objections to Plaintiffs' counters, and its responses to Plaintiffs' objections. Walgreens further reserves the right to revise or withdraw its affirmative deposition testimony designations for Deborah Bish, its objections to Plaintiffs' counters, and its responses to Plaintiffs' objections based on the Court's rulings, Plaintiffs' and other individual Defendants' designations of deposition testimony, and evidence introduced at

trial. Walgreens also reserves the right to play, in response to deposition testimony played by Plaintiffs, any testimony they designated affirmatively. Walgreens also reserves the right to play any testimony Plaintiffs have designated.

By submitting these affirmative deposition testimony designations for Deborah Bish together with its objections to Plaintiffs' counters and responses to Plaintiffs' objections, Walgreens does not waive any objections to the use of testimony and/or exhibits or their subject matter. Walgreens' inclusion of any testimony and/or exhibit within these affirmative deposition testimony designations for Deborah Bish together with its objections to Plaintiffs' counters and Walgreens' responses to Plaintiffs' objections should not be construed as an admission that such testimony and/or exhibit is admissible if offered by Plaintiffs or another Defendant. Walgreens expressly reserves the right to object to Plaintiffs' attempts to introduce any testimony and/or exhibit included in these affirmative deposition testimony designations for Deborah Bish together with its objections to Plaintiffs' counters and Walgreens' responses to Plaintiffs' objections.

Dated: October 10, 2019

/s/ Katherine M. Swift

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served on October 10, 2019 via electronic transfer to all counsel of record, consistent with the Court's order.

/s/ Katherine M. Swift
Katherine M. Swift

Counsel for Walgreen Co.